

EXHIBIT A

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PLD-PI-001

SHORT TITLE:

Jackson v. Silicon Valley Animal Control Authority

CASE NUMBER:

4. ☐ Plaintiff (name):

is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

a. ☒ except defendant (name): Silicon Valley Animal

(1) ☐ a business organization, form unknown

(2) ☐ a corporation

(3) ☐ an unincorporated entity (describe):

(4) ☒ a public entity (describe):

Form Unknown

(5) ☐ other (specify):

c. ☒ except defendant (name): City of Campbell

(1) ☐ a business organization, form unknown

(2) ☐ a corporation

(3) ☐ an unincorporated entity (describe):

(4) ☒ a public entity (describe):

City

(5) ☐ other (specify):

b. ☒ except defendant (name): City of Santa Clara

(1) ☐ a business organization, form unknown

(2) ☐ a corporation

(3) ☐ an unincorporated entity (describe):

(4) ☒ a public entity (describe):

City

(5) ☐ other (specify):

d. ☒ except defendant (name): Humane Society Silico

(1) ☒ a business organization, form unknown

(2) ☐ a corporation

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

☐ Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

a. ☒ Doe defendants (specify Doe numbers): 1 to 10 were the agents or employees of other named defendants and acted within the scope of that agency or employment.

b. ☒ Doe defendants (specify Doe numbers): 11 to 20 are persons whose capacities are unknown to plaintiff.

7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

a. ☐ at least one defendant now resides in its jurisdictional area.

b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.

c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.

d. ☐ other (specify):

9. ☒ Plaintiff is required to comply with a claims statute, and

a. ☒ has complied with applicable claims statutes, or

b. ☐ is excused from complying because (specify):

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10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. ☐ Motor Vehicle
- b. ☒ General Negligence
- c. ☒ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☒ Other (specify):

Exemplary Damages

11. Plaintiff has suffered

- a. ☐ wage loss
- b. ☒ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☒ property damage
- f. ☐ loss of earning capacity
- g. ☒ other damage (specify):

Other damage not known at this time

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☒ punitive damages

The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

15. ☐ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

Date: 1-29-07

Stuart M. Wilson

(TYPE OR PRINT NAME)

Stuart M. Wilson

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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PLD-PI-001(2)

First (number) **CAUSE OF ACTION—General Negligence** Page 4

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Lee Jackson and Kenneth Jackson

alleges that defendant (name): Silicon Valley Animal Control Authority and City of Santa Clara

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): December 19, 2005

at (place): Santa Clara, California

(description of reasons for liability):

Defendants unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals.

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Second CAUSE OF ACTION—General Negligence Page 5
(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Lee Jackson and Kenneth Jackson

alleges that defendant (name): City of Campbell

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): December 22, 2005

at (place): Santa Clara, California

(description of reasons for liability):

Defendant unlawfully conducted a post-seizure hearing in which Defendant found that the seizure of Plaintiff's property on 12-19-05 was lawful. Said finding was a denial of the due process rights of Plaintiffs and was an abuse of discretion violating Plaintiffs rights to a fair due process hearing.

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PLD-PI-001(2)

Third

(number)

CAUSE OF ACTION—General Negligence

Page 6

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Lee Jackson and Kenneth Jackson

alleges that defendant (name): Silicon Valley Animal Control Authority, City of Santa Clara

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): On or about 12-19-05

at (place): Santa Clara, California

(description of reasons for liability):

Defendants negligently hired, trained and supervised employees including A. Morris, Al Davis, and others not known known by name who participated in the events surrounding the unlawful seizure of Plaintiffs' pet animals on 12-19-05.

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Fourth CAUSE OF ACTION—General Negligence Page 7
(number)

ATTACHMENT TO ☐ Complaint ☒ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Lee Jackson and Kenneth Jackson

alleges that defendant (name): Silicon Valley Animal Control Authority and City of Santa Clara

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): On or about 12-19-05

at (place): Santa Clara, California

(description of reasons for liability):

Defendants unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals thereby negligently inflicting severe emotional and mental suffering and distress upon the Plaintiffs.

PLD-PI-001(3)

SHORT TITLE:

Jackson v. Silicon Valley Animal Control Authority

CASE NUMBER

Fifth

(number)

CAUSE OF ACTION—Intentional TortPage 8ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson

alleges that defendant (name): Silicon Valley Animal Control Authority and City of Santa Clara

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff

on (date) December 19, 2005

at (place) Santa Clara, California

(description of reasons for liability):

Defendant unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals. Said acts constitute assault and battery.

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Sixth CAUSE OF ACTION—Intentional Tort Page 9
(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson

alleges that defendant (name): Silicon Valley Animal Control Authority and City of Santa Clara

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff
on (date) December 19, 2005
at (place) Santa Clara, California

(description of reasons for liability):

Defendant unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals. By said acts Defendants intentional inflicted severe emotional and mental suffering and distress upon Plaintiffs.

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Seventh **CAUSE OF ACTION—Intentional Tort** Page 10
(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson

alleges that defendant (name): Silicon Valley Animal Control Authority and City of Santa Clara

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff

on (date) December 19, 2005

at (place) Santa Clara, California

(description of reasons for liability):

Defendants unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals. Plaintiffs were the lawful owners of said pet animals and were entitled to possession of the animals. By said acts Defendants unlawfully converted the pet animals to their use.

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Eighth **CAUSE OF ACTION—Intentional Tort** Page 11
(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson

alleges that defendant (name): Silicon Valley Animal Control Authority and City of Santa Clara

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff
on (date) December 19, 2005
at (place) Santa Clara, California

(description of reasons for liability):

Defendants unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals. Such acts violated Plaintiffs' rights to be free of unreasonable searches and seizures under the Fourth and Fourteenth Amendments to the U.S. Constitution and is actionable under 42 U.S.C. section 1983.

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Ninth CAUSE OF ACTION—Intentional Tort Page 12
(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson
alleges that defendant (name): Humane Society Silicon Valley

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff
on (date) December 19, 2005
at (place) Santa Clara, California

(description of reasons for liability):

Defendant took possession of the Plaintiffs' pet animals that had been seized by the Silicon Valley Animal Control Authority and converted them to their own use.

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Exemplary Damages Attachment

Page 13

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

EX-1. As additional damages against defendant (name):

Silicon Valley Animal Control Authority and City of Santa Clara

Plaintiff alleges defendant was guilty of

- ☒ malice
☒ fraud
☒ oppression

as defined in Civil Code section 3294, and plaintiff should recover, in addition to actual damages, damages to make an example of and to punish defendant.

EX-2. The facts supporting plaintiff's claim are as follows:

Defendants unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals.

EX-3. The amount of exemplary damages sought is

- a. ☒ not shown, pursuant to Code of Civil Procedure section 425.10.
b. ☐ \$